

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Mashreq Bank psc**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

Organizational Structure and Purpose of Mashreqbank psc

2. In 1967, Mashreq Bank psc ("Mashreq Bank") was established as the Bank of Oman Ltd. in Dubai, and incorporated in the United Arab Emirates (UAE) under a decree issued by the ruler of Dubai.

3. Mashreq Bank started private banking operations in 2001, and now manages \$3 billion in assets for about 12,000 customers in the Gulf, each with assets of at least \$1 million.

4. Mashreq Bank is the largest private bank in the UAE with branches in 12 countries, and total assets of more US\$ 8,698 million, banking one in every two households in the UAE.

5. Mashreq bank conducts business in the United States through offices located in New York City at the following address: 255 5th Avenue, New York, New York 10016.

6. Mashreqbank served as one of the main conduits of funds from Saudi Arabia to the Taliban/Al Qaeda.

7. In 2001, the United States Federal Bureau of Investigation (FBI) discovered that most of the 19 suicide hijackers involved in September 11, 2001 terrorist attacks on the United States held credit card accounts operating out of Mashreqbank's Sudan branch at the following address: P.O. Box 371, Baldia Street, Khartoum, Sudan 772840.

8. Mashreq Bank was party to a \$600,000 transfer from AFG Bank account in

Deutsche Bank, Hamburg to Pacha Wazir with Mashreq Bank, Dubai.

9. Pacha Wazir is the representative of Abdul Bari, a very close financier and friend of Osama Bin Laden and Mullah Omar.

10. In 2003, Abdul Q. Fitrat, the first deputy governor of Afghanistan's central bank and a former Washington, D.C. IMF employee, identified Haji Abdul Bari as, "a very close associate of [Taliban leader] Mullah Omar and Osama bin Laden, who got a lot of funds" by acting as a *hawala* (translation: to change/ transfer debts via bills of exchange) dealer for the men in the ungovernable border area of Afghanistan and Pakistan.

11. The bank documents in the above transaction state that the monies in dollars are to be paid to the accounts of Pacha Wazir, the representative of Abdul Bari.

12. The bank statement for the transaction indicates an account involving Pacha Wazir in Mashreq Bank, Dubai, from November 1998 to October 1999 involving monies—and transaction(s)—of over \$13 million U.S. dollars and about 5 million Deutsche Marks.

13. In September 2001, the U.S. State Department maintained that their powers would extend to closing down correspondent relationships with banks which do not co-operate with the hunt for terrorist funds.

14. Mashreq Bank maintains a correspondent banking relationship with the following entities: ABN Amro, Fortis Bank, Barclays, Bank of America, Credit Suisse First Boston, Banque Nationale de Paris, Banca Nazionale del Lavoro and Westpac, among others.

15. Mashreq Bank also maintains a correspondent banking relationship with Al Shamal Islamic Bank.

16. Al Shamal Islamic Bank was involved in funding Osama Bin Laden terrorist activities.

17. A 1996 U.S. State Department report on Osama bin Laden's finances demonstrates that Osama bin Laden co-founded Al Shamal Islamic Bank with a group of wealthy Sudanese and capitalized it with \$50 million of his inherited fortune.

18. Al Shamal Islamic Bank enabled Osama bin Laden to move money quickly from one country to another through its correspondent relationships with some of the world's major banks, several of which have been suspended since the September 11th attacks on the United States.

19. Al Shamal Islamic Bank was founded and controlled by Saudi individuals and entities, in connection with Sudan's Hassan Al Turabi.

20. In the 1986 elections, Turabi led a new faction of the Muslim Brotherhood, the National Islamic Front (NIF).

21. When Hassan Al Turabi took power in 1989, Sudan became an operational base for international Islamic terrorism groups, as reported by the State Department annual "Patterns of Global Terrorism" for 1991

22. In 1991, Osama Bin Laden settled in Sudan where he was invited by Hassan Al Turabi and the Sudanese government.

23. Osama Bin Laden's close relationship with the new regime became "symbiotic" and he conducted several business projects with or on behalf of the NIF.

24. The Al Bir Organization (Benevolence International Foundation – BIF- holding charity) is a shareholder of Al Shamal Islamic Bank bank.

25. SDGT Adel Abdul Jalil Batterjee, Chairman of Al Bir and founder of BIF, is Chairman of Al Shamal Islamic Bank.